EXHIBIT D

1   IN THE UNITED STATES DISTRICT COURT

2   DISTRICT OF MASSACHUSETTS

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4   CIVIL ACTION NO. 1:10-CV-10588(JLT)

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6 GLASS DIMENSIONS, INC., ON BEHALF OF :

   THE GLASS DIMENSIONS, INC. PROFIT   :

7 SHARE PLAN AND TRUST, and ALL OTHERS :

   SIMILARLY SITUATED,   :

8   PLAINTIFFS,   :

                                         :

9   v.   :

                                         :

10 STATE STREET CORPORATION, STATE STREET:

   BANK & TRUST CO., AND STATE STREET   :

11 GLOBAL ADVISORS,   :

              DEFENDANTS.   :

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14   VIDEOTAPED DEPOSITION OF MAUREEN PERKINS, a

15 witness called on behalf of the Defendants, pursuant

16 to the provisions of the Federal Rules of Civil

17 Procedure, before Lisa McDonald Valdario, (CSR

18 #130093), a Registered Professional Reporter and

19 Notary Public in and for the Commonwealth of

20 Massachusetts, at the Offices of Wilmer, Cutler,

21 Pickering, Hale and Dorr, LLP, 60 State Street,

22 Boston, Massachusetts 02109, on Thursday, June 16,

23 2011, commencing at 10:47 a.m.

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1   Street Bank, so I would say I would administer in

2   that capacity, tell State Street Bank this person

3   wants to leave, and this is the amount of money,

4   and they would release the check.

5 Q Okay. What is your understanding as to all of the

6   things that the administrator is supposed to do

7   for The Plan?

8 A Well, it's to make sure that everything is done

9   properly and according to the law, and that's why

10   we hired Sentinel Benefits to do the accounting.

11   That's why we hired a reputable bank to handle the

12   investments because we both knew that we

13   weren't -- needed help with that, and that's why

14   we used reputable companies to do the accounting

15   and to tell us know that we were doing our job

16   properly. And to do the filings.

17 Q Now, does the administrator do anything else?

18 A Not to my knowledge. You have a responsibility to

19   make sure things are done correctly, and that we

20   have, we are prudent in our investments, and that

21   we don't do anything incorrectly.

22 Q Apart from what you've described, any other

23   functions for the administrator?

24 A Not that I can think of. I mean, I -- no.

1   investments, and you know, a responsibility to the

2   participants, as being a fiduciary.

3 Q How is it that the administrator came to hire

4   State Street to provide services for The Plan?

5 A In conjunction with my accounting firm, they

6   suggested that we go to State Street Bank.

7 Q So tell me the best you can remember when you made

8   the decision to hire State Street, and what it is

9   your accounting firm said to you about State

10   Street.

11 A I don't really recall what the date was. They

12   just suggested that it was a reputable bank and

13   that they felt the investing abilities there were

14   appropriate, and that they would invest properly.

15 Q Did, do you have any recollection as to which year

16   you came to State Street?

17 A No, but it could have been the early '90s. I'm

18   not sure.

19 Q Okay. Before you made the decision to hire State

20   Street, did you ever meet anyone from State

21   Street?

22 A Yes.

23 Q And who was that?

24 A I don't recall their names. There was four, five

1 Q What prompted you to think you were a lending fund

2   investor or to ask the question, am I a lending

3   fund investor?

4 A My initial concern with State Street was the fact

5   that we weren't able to get our funds out when we

6   decided to close The Plan. So I was concerned as

7   to if that was an appropriate method on their

8   behalf to only allow us to take out 4 percent a

9   month of a certain amount of money, and so I was

10   contacting Greg to ask if that was related to the

11   case that he had, and so that's when I, then I

12   learned about the securities lending program.

13 Q Okay. And the article that you saw that mentioned

14   Mr. Porter, what did that article say?

15 A I can't recall the article, the exact article. It

16   was in a newspaper clipping that I read, that

17   there were two attorneys' names listed as being

18   counsel for a suit, and I called them both, spoke

19   with them both, and Greg called me back.

20 Q You don't remember what the article said?

21 A It was just that they were involved in this case,

22   and I'm not -- I mean, I was not familiar with

23   what the case was or what it was about or

24   anything. I was not clear on that. I just didn't

1   2004 to 2010 was probably a thousand, but I don't

2   know when that started so I'm not exactly clear on

3   that.

4 Q Did Darrell receive any compensation from the

5   company?

6 A Yes.

7 Q And for the period 2004 to 2010, what was his

8   average compensation?

9 A Per year?

10 Q That would be okay.

11 A I guess around 32, 35,000.

12 Q Did you receive any other compensation from the

13   company?

14 A Not from Glass Dimensions, no.

15 Q Now I'd like to talk about, if you can, the trial

16   of this case. If this case has a trial, are you

17   planning to attend the trial?

18 A Yes.

19 Q And are you anticipating any special payment for

20   your efforts to prosecute this case?

21 A No.

22 Q So no special payment for attending this

23   deposition.

24 A Correct.

1   Q   And no special payment for attending the trial

2   either.

3   A   No.

4   Q   Have you thought about how an award should be

5   distributed in this case, given any thought to

6   that?

7   A   It should be distributed, where it's a class

8   action suit, against all of the individuals

9   involved in the suit, and it should be distributed

10   in a fair and equitable manner.

11   Q And how, what circumstances or factors influence a

12   judgment as to the fairness of a distribution?

13   A Probably their investment, how much of their

14   investment was involved.

15   Q So I want to make sure I understand you. If there

16   is an award in this case, then it should be

17   distributed pro rata across all investors

18   according to their investment in a lending fund,

19   is that what you're saying?

20   A Yes.

21   Q Should the award vary based on the services that

22   State Street provided each lending fund?

23   A I guess it would be commensurate with their

24   investment, I guess. It would be based on their